

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff,

v.

CHINA NORTHEAST PETROLEUM HOLDINGS  
LIMITED; WANG HONGJUN, (a/k/a Hongjun  
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG  
CHAO (a/k/a/ Chao Jiang)

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and SUN  
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

Case No. 12-CV-8696 (NRB)  
ECF Case

**PLAINTIFF’S RESPONSE TO SCHIFF HARDIN LLP’S MOTION TO  
WITHDRAW AS COUNSEL FOR HONGUN WANG AND SUN JISHUANG**

By motion dated October 11, 2013 and filed under seal, Schiff Hardin LLP has moved to withdraw as counsel for Defendant Wang Hongjun (“Wang”) and Relief Defendant Sun Jishuang (“Sun”). See Dkt. No. 54. Plaintiff, the United States Securities and Exchange Commission (the “Commission”), has no knowledge of the grounds for withdrawal and, in any event, takes no position on the motion to withdraw. However, the Commission respectfully requests that the Court order, as a condition of withdrawal, if granted, that (i) current contact information for Wang and Sun be provided to the Court and counsel for the remaining parties and (ii) ECF

accounts be established for Wang and Sun to assure proper service and notice going forward.

Dated: October 16, 2013

Respectfully submitted,

/s/ Ansu N. Banerjee

Alfred A. Day

Ansu N. Banerjee

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